



Indiana Department of Education
SUPPORTING STUDENT SUCCESS

February 1, 2011

Ms. Michele Starkey
Logansport Community School Corporation
2829 George Street
Logansport, Indiana 46947

Dear Ms. Starkey:

We received the Logansport Community School Corporation's desktop monitoring rubric and supporting information on October 8, 2010. The Indiana Department of Education's (IDOE) monitoring team reviewed the materials to evaluate Logansport Community School Corporation's administration and oversight of McKinney-Vento projects, in accordance with the McKinney-Vento Education for Homeless Children and Youth Act. Enclosed is a report based upon this review.

The enclosed report summarizes the results of our desktop monitoring review. **Within 30 business days of the date of this letter**, please submit a response, and where appropriate, further documentation. IDOE will review the documentation and determine if it is sufficient to remove or remedy identified compliance problems.

In all cases where there are findings of non-compliance, **Logansport Community School Corporation is responsible for taking appropriate action to remedy compliance deficiencies**. In some instances this can occur immediately and in some instances a longer term solution may be necessary. Where longer term measures are necessary, the corporation must submit a specific detailed action plan with timelines and benchmarks for corrective action. IDOE will provide technical assistance as appropriate.

We would like to thank you and your staff for the work and assistance provided as a part of the review in gathering materials and providing access to information in a timely manner.

We look forward to continued cooperation in working with you and your staff members on any follow-up activities to assist in the effective delivery of education services for students experiencing homelessness.

Sincerely,

Amy Bush, Director
Leneé Reedus, Supervisor
Office of Title I Academic Support

Cc: Ms. Chris Hess, Fairview Elementary School

**Indiana Department of Education
McKinney-Vento Education for Homeless Children and Youth Monitoring**

Monitoring Date: Fall 2010

Monitoring Team: Christina Endres & Leneé Reedus

Background Information

The Indiana Department of Education (IDOE) conducted a desktop monitoring review for Logansport Community School Corporation regarding the McKinney-Vento Project Grants beginning on October 8, 2010. The purpose of this monitoring review was to identify areas of strength, areas that need improvement, and areas of non-compliance with homeless education laws and federal grants management (fiscal) requirements.

IDOE specifically monitored in the following areas:

1. Local educational agencies will designate an appropriate staff person, who may also be a coordinator for other Federal programs, as a local educational agency liaison for homeless children and youths. 42 USC 11432 (g)(J)(ii)
2. Each liaison for homeless children and youth shall ensure homeless children and youths are identified by school personnel and through coordination activities with other entities and agencies. 42 USC 11432 (g)(6)
3. The local educational agency shall implement a coordinated system for ensuring that homeless children and youths are promptly provided necessary services, including transportation. 42 USC 11432 (e)(3)(E)
4. In order to help low-achieving children meet challenging achievement academic standards, each local educational agency plan shall include a description of how the local educational agency will coordinate and integrate services provided with other educational services at the local educational agency or individual school level, such as services for homeless children, a description of the services the local educational agency will provide homeless children, including services provided with funds reserved. 20 USC 6312
5. Students experiencing homelessness have the right to immediate enrollment in the school of origin or the local school. LEAs must have a process for resolution of disputes and provide a statement of rights to homeless youth or their parent/guardian. In order to expedite enrollment, LEAs must enroll students even if documentation normally required is absent. 42 USC 11432 (g)(3)(E); 42 USC 11432 (g)(3)(C); 42 USC 11432 (e)(3)(C)
6. Liaisons for homeless children and youth shall, as a part of their duties, coordinate and collaborate with State coordinators and community and school personnel responsible for the provision of education and related services to homeless children and youth. Development and growth of collaborative relationships should be evident. 42 USC 11432 (g)(6)(C)
7. Local educational agencies have developed and shall review and revise policies to remove barriers to the enrollment and retention of homeless children and youths in school. 42 USC 11432 (e)(3)(E)(iv); 42 USC 11432(g)(1)(I)
8. The Local Education Agency subgrant plan for services to eligible homeless students meet all requirements. (fiduciary) 42 USC 11432(e)(1); 42 USC 11433

As a part of the review, IDOE communicated with the McKinney-Vento Liaison for the school district. IDOE also reviewed documents provided by Logansport Community School Corporation pertaining to implementation of state and federal homeless education laws including the use of grant funds. Based on the above information, our report follows.

Monitoring Topic 1: Local educational agencies will designate an appropriate staff person, who may also be a coordinator for other Federal programs, as a local educational agency liaison for homeless children and youths.

Background

IDOE reviewed information provided by the McKinney-Vento Liaison.

Statutory Requirement: McKinney-Vento Liaison requirements are located in 42 USC 11432(g)(J)(ii) and I.C. 50-1-3.

Areas of Compliance

Meets Standard: At the time of the review, Michele Starkey, Curriculum Director, was registered with the IDOE as the McKinney-Vento Liaison for the district. Contact information related to the homeless program was listed online. To view the contact information, three separate webpages must be visited through the Administration menu. School board policy 5111.01 also cited the responsibility of the district to post liaison contact information on the district website and to report the information to the IDOE.

Recommendation: It is recommended that the liaison's contact information be posted on the homepage. Currently, while the information is posted online, it is not on the main page for the website. Posting it on the homepage would be more consistent with the intent of I.C. 50-1-3.

Monitoring Topic 2: Each liaison for homeless children and youth shall ensure homeless children and youths are identified by school personnel and through coordination activities with other entities and agencies.

Background

IDOE reviewed information provided by the McKinney-Vento Liaison.

Statutory Requirement: McKinney-Vento Liaison requirements pertaining to identification and coordination are located in 42 USC 11432 (g)(6). Evidence provided must include a housing questionnaire or similar documentation, or documented communication with local community services providers, or proof of events targeted to homeless students. A description of the process used to ensure data accuracy must also be provided.

Areas of Compliance

Meets Standard: The housing questionnaire and statement of rights provided by the district provided evidence of the district's efforts to identify students experiencing homelessness. Training sessions are also conducted with district staff members to ensure their knowledge of the policy and procedures.

Monitoring Topic 3: The local educational agency shall implement a coordinated system for ensuring that homeless children and youths are promptly provided necessary services, including transportation.

Background

IDOE reviewed information provided by the McKinney-Vento Liaison.

Statutory Requirement: McKinney-Vento Liaison requirements pertaining to the LEA's coordinated system for service delivery is located in 42 USC 11432 (e)(3)(E). Evidence must include a written policy for transportation. Additional evidence may include bus routes, inter-district transportation agreements, contracts with transportation providers.

Areas of Compliance

Exceeds Standard: The district provided two school board policies: 8600-Transportation and 5111.01-Homeless Students. While the transportation policy (8600) did not specifically cite transportation for homeless students, school board policy 5111.01 specifically cited the right to transportation services for students in homeless situations. Furthermore, the district administrative guidelines extensively state the responsibilities and process for coordinating transportation. A memorandum of agreement between the Logansport Community School District and a neighboring district also provided evidence of efforts made by the district to provide transportation to homeless students.

Monitoring Topic 4: In order to help low-achieving children meet challenging achievement academic standards, each local educational agency plan shall include a description of how the local educational agency will coordinate and integrate services provided with other educational services at the local educational agency or individual school level, such as services for homeless children, a description of the services the local educational agency will provide homeless children, including services provided with funds reserved.

Background

IDOE reviewed information provided by the McKinney-Vento Liaison.

Statutory Requirement: Requirements pertaining to the coordination with other programs may be found in 20 USC 6312. Evidence must include information from the Title I application indicating coordination and set-aside.

Areas of Compliance

Meets Standard: The Title I, Part A application indicating a set-aside for homeless students was provided. The McKinney-Vento Liaison and the Title I Program Administrator are the same individual for this district.

Monitoring Topic 5: Students experiencing homelessness have the right to immediate enrollment in the school of origin or the local school. LEAs must have a process for resolution of disputes and provide a statement of rights to homeless youth or their parent/guardian. In order to expedite enrollment, LEAs must enroll students even if documentation normally required is absent.

Background

IDOE reviewed information provided by the McKinney-Vento Liaison.

Statutory Requirement: Dispute resolution, enrollment, and student rights requirements are located in 42 USC 11432 (g)(3)(E), 42 USC 11432 (g)(3)(C) and 42 USC 11432 (e)(3)(C). Evidence must include a statement of student rights and a dispute resolution policy. Supplemental evidence may include a sample letter explaining a decision to deny enrollment or services, including the notification of a student's right to appeal; letters or memoranda to assist with enrollment; fee waivers; or timeline waivers for medical, school, or other records.

Areas of Compliance

Exceeds Standard: The statement of rights is provided with the housing questionnaire. District administrative code specifically cites the actions to be taken and responsible parties for obtaining missing records for homeless students. The administrative code further outlines steps to be taken in the instance of a dispute. Dispute resolution appeal processes are outlined in detail and include responsible parties as well as timelines. Board policy 2260 regarding non-discrimination and educational access references a right to learn regardless of place of residence and social or economic background. A form is also available that allows families to indicate their inability to provide a birth certificate and lists other items that could be used to verify date of birth.

Required Action: The statement of rights should have an additional line for the liaison signature. Although the overall outline is exceptional, the reference to state guidelines for appeal procedures in the district administrative code is not accurate and should be updated. All determinations made by the investigator assigned by the Department of Education are final and may not be appealed further. The Department of Education also has 30 days in which to issue a resolution to any requests for dispute resolution. Language should be changed from 'state coordinator' to 'Department of Education' as the state coordinator may or may not be the investigator assigned to the complaint, depending on the type of request for mediation filed. A draft policy should be submitted to IDOE within 30 business days. The district should finalize any district approval for the revisions in its next policy and procedure review.

Monitoring Topic 6: Liaisons for homeless children and youth shall, as a part of their duties, coordinate and collaborate with State coordinators and community and school personnel responsible for the provision of education and related services to homeless children and youth. Development and growth of collaborative relationships should be evident.

Background

IDOE reviewed information provided by the McKinney-Vento Liaison.

Statutory Requirement: A description of liaison responsibilities for coordination and collaboration with other persons and agencies is located in 42 USC 11432 (g)(6)(C). Evidence must include MOU's or contracts with community agencies, or flyers and other evidence of outreach efforts. Supplemental evidence must include one of the following: resource lists, documentation that a clinic provided services to a homeless student, or proof of payment for a school related activity paid for a student through school funding.

Areas of Compliance

Meets Standard: Board Policy 5111 and administrative code cites the liaison's duty to coordinate with the state coordinator and other community and program representatives. Letters of support for the district's grant project to provide services to students experiencing homelessness were provided. Examples of requisitions and claims for services provided to students were provided. Information provided indicated involvement in a collaborative effort to establish a county-wide resource network.

Monitoring Topic 7: Local educational agencies have developed and shall review and revise policies to remove barriers to the enrollment and retention of homeless children and youths in school.

Background

IDOE reviewed information provided by the McKinney-Vento Liaison.

Statutory Requirement: A description of the responsibility to remove barriers and revise policies may be found in 42 USC 11432 (e)(3)(E)(iv) and 42 USC 11432(g)(1)(I).

Areas of Compliance

Meets Standard: Policies are reviewed and revised annually. Training sessions are conducted with various staff members to ensure proper student identification and services.

Monitoring Topic 8: The Local Education Agency subgrant plan for services to eligible homeless students meet all requirements. (fiduciary)

IDOE reviewed information provided by the McKinney-Vento Liaison.

Statutory requirements for fiscal procedures may be found in 42 USC 11432(e)(1) and 42 USC 11433.

Evidence required included a statement of actual expenditures made from grant funds.

Areas of Compliance

Meets Standard: Invoices, vouchers, and requisitions were provided as samples of compliance. An expenditure report was also submitted. Expenses were found to be aligned to the approved grant activities.